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December 6, 2004

Surface Transportation Board
Case Control Unit
Attn: Kenneth Blodgett
STB Docket No. FD 30186 (Sub-No. 3)
Washington, D.C. 20423

Dear STB:

I have been aware of the proposed Tongue River Railroad since about the mid 1980's. I celebrated when the permit for the Montco Mine was withdrawn. I laughed, but it wasn't funny, when the company decided they didn't like the approved 4-Mile route through to Decker and decided, instead, it would pursue the Western Alignment. The speculators are attempting to inch their way toward their goal, by piece-mealing the analysis and with this DSEIS, the STB is going along with that strategy. It does not meet the test of NEPA.

The original EIS was written long ago. The original analysis was for an 89-mile dead end road to service the Montco Mine. The nature of the line was changed completely when it was proposed to run through to Decker. Wyoming coal will now be able to out-compete Montana coal in the traditional Montana markets in the upper mid-west. The original purpose, ostensibly serving Montana, is completely by-passed. The STB needs to step back and take a hard, comprehensive look at the impacts of this railroad on existing Montana coalmines and employment and on the existing agricultural community in the Tongue River valley.

The area of the railroad corridor is slated for extensive coal bed methane (CBM) development. In some cases the corridor and CBM development plans overlap. The DSEIS has not considered the impacts of these two heavy industrial uses in tandem. The Western Alignment requires much more cut and fill next to the river. What is the impact of that increased potential sediment load, especially in conjunction with the increase in high-sodium CBM produced water going into the river? What's the impact of these two industrial intrusions on the existing agricultural economy of the valley?

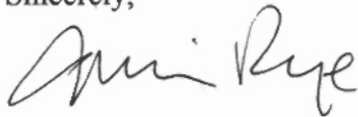
Why has the DSEIS not incorporated new data that is available on water quality in the Tongue? There has been a lot of work done in the last few years because of the focus on water quality brought about by the threat of CBM development. That information should be part of the current analysis.

The railroad will have authority to condemn property through eminent domain. The landowners who will be condemned face a devastating future. They have made improvements to their land and operations in the last 20 years that need to be evaluated when considering the impacts of this railroad. This DSEIS only looks at the Western Alignment as opposed to the 4-Mile alternative; it should look at the impact of the whole line, north to south, in terms of today. Have the effects of a railroad cutting through ranches been evaluated in terms of today's real estate market? Fires, weeds, split grazing land, and noise are just the worst of the impacts a landowner can expect with a railroad running through their place.

Is this railroad necessary to anyone but the speculators? If it is, then why hasn't any progress been made in the 8 years it has had a permit. The Montco Mine permit was finally pulled because no progress had been made toward developing the mine because it didn't make any economic sense to do so. Why hasn't the same thing happened to the permit for this railroad? The railroad is a bad idea. It will hurt Montana ranchers and farmers in the Tongue River Valley. It will hurt Montana coalmines and coal miners by taking their present coal markets.

This idea of writing a supplemental EIS of a document that was originally done over 15 years ago is invalid. At the very least the STB needs to write a new EIS that looks at the impacts today of the entire line using current information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Julia Page".

Julia Page